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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
Jan 15, 2020
SUE BEITIA, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 20-00059-KJM
)	
Plaintiff,)	EX PARTE MOTION TO SEAL
)	COMPLAINT, AFFIDAVIT AND
v.)	DECLARATION
)	
PASTOR ABERO,)	
)	
Defendant.)	
)	

EX PARTE MOTION TO SEAL COMPLAINT,
AFFIDAVIT AND DECLARATION

The United States of America, by and through its undersigned

SEALED
BY THE ORDER OF THE COURT

counsel, hereby moves this Honorable Court for an Order sealing the Complaint and Affidavit attached to the Complaint in the above-entitled matter and the Declaration of Counsel attached hereto on the ground that investigation into the matter is ongoing, and disclosure of the information contained in the Complaint and Affidavit may interfere with said investigation.

This motion is made pursuant to the inherent power of this Court, and is based upon the records and files of this case and the attached Declaration.

DATED: January 15, 2020, at Honolulu, Hawaii.

KENJI M. PRICE
United States Attorney
District of Hawaii

By /s/ Sean Van Demark
SEAN VAN DEMARK
Assistant U.S. Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 20-00059-KJM
)	
Plaintiff,)	DECLARATION OF COUNSEL
)	
v.)	
)	
PASTOR ABERO,)	
)	
Defendant.)	
_____)	

DECLARATION OF COUNSEL

I, SEAN VAN DEMARK, upon penalty of perjury, declare and state that the following is true and correct to the best of my knowledge and belief:

1. I am an Assistant U.S. Attorney with the U.S. Attorney's Office for the District of Hawaii. I am familiar with the criminal investigation described in the Affidavit attached to the Criminal Complaint in the above-captioned Magistrate's Case.

2. I am informed and believe that said defendant is currently out of custody and is likely to become difficult to locate should he become aware of the Criminal Complaint and Arrest Warrant. Should the defendant become aware of an impending arrest there may be risk or both flight and danger to law enforcement and the community. In addition, this defendant has a lengthy record including convictions for 12 felonies and 14 misdemeanors with 34 arrests for criminal

contempt of court.

DATED: January 15, 2020, at Honolulu, Hawaii.

KENJI M. PRICE
United States Attorney
District of Hawaii

By /s/ Sean Van Demark
SEAN VAN DEMARK
Assistant U.S. Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 20-00059-KJM
)	
Plaintiff,)	ORDER GRANTING EX PARTE
)	MOTION TO SEAL COMPLAINT,
v.)	AFFIDAVIT AND DECLARATION
)	
PASTOR ABERO,)	
)	
Defendant.)	
_____)	

ORDER GRANTING EX PARTE MOTION TO SEAL COMPLAINT,
AFFIDAVIT AND DECLARATION

The Court having considered the United States of America's Ex Parte Motion to Seal Complaint, Affidavit, and Declaration and good cause appearing therefor,

It is hereby ordered that the Complaint, Affidavit in Support of the Complaint, and Declaration in Support of the Ex Parte Motion in regard to the above-entitled matter be sealed until further Order of this Court.

DATED: January 15, 2020, at Honolulu, Hawaii.



A handwritten signature in blue ink, appearing to read "K. Mansfield".

Kenneth J. Mansfield
United States Magistrate Judge